



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RQ-2

December 22, 2006

Ms. Sarah Brown, Treasurer  
Ohio Republican Party State  
Central & Executive Committee  
211 S. Fifth Street  
Columbus, OH 43215

**Response Due Date:**  
**January 24, 2007**

Identification Number: C00162339

Reference: Amended September Monthly Report (8/1/06 – 8/31/06), received  
11/3/06

Dear Ms. Brown:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. This notice requests information essential to full public disclosure of your federal election campaign finances. **An adequate response must be received at the Commission by the response date noted above.** An itemization of the information needed follows:

-Schedule A supporting Line 15 of your report discloses an offset to an operating expenditure(s) totaling \$1,283.04 from "FOLTIN FOR CONGRESS" and "Michael Murry"; however, your report(s) does not appear to disclose a disbursement to this entity. Please provide clarifying information regarding this activity and amend your report(s) if necessary.

-Schedule B supporting Line 30(b) of your report discloses one or more disbursements to "AT&T-SBC," "Cincinnati Bell," "VERIZON WIRELESS #2," and "Victory Solutions LLC" and several corresponding memo entries detailing the portion of the disbursement allocated to each federal candidate. However, the sum of the corresponding memo entries on Line 30(b) does not equal each respective payment. If part of each disbursement was for your committee and not a federal candidate, please indicate that amount in addition to the amounts allocated to each federal candidate. Please amend your report to clarify these discrepancies.

-Schedule H4 supporting Line 21(a) of your report discloses a payment(s) for "non federal staff cell phones not 25%" and "non federal staff health

insurance". A committee is permitted to pay the entire amount of an allocable activity from its federal account and receive a transfer(s) from its non-federal account solely to cover the non-federal share of the allocable expense(s). 11 CFR §§106.6(e) and 106.7(f) However, a payment for 100% non-federal administrative expenses does not fall within the definitions of an allocable expense, and constitutes an impermissible transfer of funds received by your federal account from your non-federal account.

The Commission recommends you immediately transfer the total amount received by your federal account back to your non-federal account. Although the Commission may take further legal action concerning this prohibited activity, your prompt action will be taken into consideration.

**Please note, you will not receive an additional notice from the Commission on this matter.** Adequate responses received on or before this date will be taken into consideration in determining whether audit action will be initiated. **Requests for extensions of time in which to respond will not be considered.** Failure to provide an adequate response by this date may result in an audit of the committee. Failure to comply with the provisions of the Act may also result in an enforcement action against the committee. Any response submitted by your committee will be placed on the public record and will be considered by the Commission prior to taking enforcement action.

Electronic filers must file amendments (to include statements, designations and reports) in an electronic format and must submit an amended report in its entirety, rather than just those portions of the report that are being amended. If you should have any questions regarding this matter or wish to verify the adequacy of your response, please contact me on our toll-free number (800) 424-9530 (at the prompt press 5 to reach the Reports Analysis Division) or my local number (202) 694- 1157.

Sincerely,



Laura E. Sinram  
Campaign Finance Analyst  
Reports Analysis Division

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